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Attorneys for Plaintiff
KEYHERRA GREEN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KEYHERRA GREEN ,
Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; FRED MERRICK; LORA
CODY; and DOES 1-10, inclusive,
Defendants.

Case No. 2:20-cv-00769-KJD-DJA

**STIPULATION TO EXTEND
RESPONSE DEADLINES FOR REPLIES
TO OPPOSITIONS TO MOTIONS FOR
SUMMARY JUDGMENT
(First Request)**

Plaintiff, Keyherra Green (“Plaintiff”) and Defendants Las Vegas Metropolitan Police Department, Fred Merrick and Lora Cody (“LVMPD Defendants”), and by and through their respective counsel, hereby stipulate, agree, and request that this Court extend the response deadlines for Plaintiff to reply to Defendants’ Opposition to Plaintiff’s Motion For Partial Summary Judgment and for Defendants to reply to Plaintiff’s Consolidated Opposition to Defendants’ Two Motions for

1 Summary Judgment from the current date of October 19, 2023 up to and including November 17,
2 2023.

3 This request for an extension is based on the plaintiff's and defendants' counsels'
4 deposition schedules in several other civil rights cases pending in United States court in the
5 southern district of Nevada as well deposition schedules with respect to witnesses and parties in
6 another case between the same lawyers, Mary Smith v LVMPD, Wellpath.

7 This request for an extension is made in good faith and joined by all the parties in this
8 case. The extension will not delay the proceedings but will allow the parties the necessary time
9 to litigate the case and adequately oppose the respective dispositive motions.

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1 DATED this 9th day of October, 2023.

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3 PETER GOLDSTEIN LAW CORP

KAEMPFER CROWELL

4 By: /s/ Peter Goldstein

By: /s/ Lyssa S. Anderson

5 Peter Goldstein
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7 – and –

MALCOLM P. LAVERGNE &
ASSOC.

***Attorneys for Defendants
Las Vegas Metropolitan Police
Department, Fred Merrick, and Lora
Cody***

8 Malcolm P. LaVergne
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Las Vegas, NV 89101

10 ***Attorneys for Plaintiff***

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12 **IT IS SO ORDERED.**

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14 DATED this 11th day of October, 2023.

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17 UNITED STATES DISTRICT COURT JUDGE
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